

EI, NVE and DERA would like to thank ACER for this opportunity to comment on the Intraday Cross-Zonal Gate Opening and Gate Closure Times.

This consultation answer has been made specifically for Hansa CCR according to our status as members of this CCR.

Consultation questions topic 1:

- 1. Do you find it reasonable to apply transitional GOTs which can be after 15:00 D-1 in order to give TSOs sufficient time to gain operational experience with congestion management procedures and intraday capacity calculation?*

Yes, but only if the transitional GOT is properly justified, and it does not imply discrimination between trade inside the concerned bidding zones and cross-border trades.

- 2. Do you consider the proposed GOT in the Baltic, Channel and Hansa CCRs ambitious enough or could TSOs on both sides of the bidding zone borders in those CCRs implement internal GOTs at 15:00 D-1?*

We do not consider a later GOT in Hansa CCR to be properly justified, and we do not see any reasons for setting it later than 15:00.

The Hansa CCR includes DC-interconnectors with perfectly controllable flows and one radial AC with no loopflows. This implies less uncertainty for the TSOs in their capacity calculation and in principle it should mean that the performed recalculation of capacity in the intraday timeframe will not change the capacities significantly. We are aware that flows over the DC-interconnectors will also affect the AC-grid on both sides. However it will not affect the AC-grid differently than trade within the AC-grid itself. The trade in Nordic region is to open at 15, and the trade inside Germany bidding zone opens at 15.

So we have two connected AC-grids where trade opens at 15, which are connected by controllable DC-interconnectors; then the trade on these DC-interconnectors should also be able to open at 15. The TSOs have stated before that the reason for setting the GOT at 18 instead of 15 is due to capacity recalculation processes. We do not agree with this, as the capacity recalculation is currently envisaged to be performed later than 18. Even with a GOT at 18, the market would open before the recalculation has taken place, so with this reasoning it could also open at 15. The processes which the TSOs will perform between 15 and 18 are related to the individual and common grid models for the intraday timeframe. As these processes can run with an open intraday market inside a bidding zone, they should also be able to run with trade on DC-interconnectors.

- 3. Do you consider that TSOs could further optimise their planned capacity calculation and congestion management processes to enable a transitional GOT in some CCRs to be set to 21:00 or even earlier?*

We believe that the current and planned processes are compliant with a GOT in Hansa CCR at 15, and that there is no need for a transitional GOT in this CCR.

Best regards